

EXHIBIT 21

**REDACTED VERSION
OF DOCUMENT
SOUGHT TO BE SEALED**

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Case No. 3:17-cv-00939-JCS

Plaintiff

VS

UBER TECHNOLOGIES, INC.;
OTTOMOTTO, LLC; OTTO TRUCKING
LLC

Defendants

**PLAINTIFF WAYMO LLC'S THIRD SET
OF REQUESTS FOR PRODUCTION TO
DEFENDANTS**

Honorable William H. Alsop

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PLAINTIFF'S THIRD SET OF REQUESTS FOR PRODUCTION
TO DEFENDANTS UBER TECHNOLOGIES, INC.; OTTOMOTTO, LLC; OTTO
TRUCKING LLC

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Waymo LLC (“Waymo”) request that Defendants Uber Technologies, Inc. (“Uber”), Ottomotto, LLC (“Ottomotto”), and Otto Trucking LLC (“Otto Trucking” (collectively “Defendants”), produce for inspection and copying within thirty days (30) hereof the documents set forth below at the offices

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1 of Quinn Emanuel Urquhart & Sullivan, LLP, 50 California Street, 22nd Floor, San Francisco,
 2 California, 94111, or at a place and time as may be agreed to by counsel.

DEFINITIONS

4 1. “WAYMO” means Waymo LLC and its officers, directors, current and former
 5 employees, counsel, agents, consultants, representatives, and any other persons acting on behalf
 6 of any of the foregoing, and WAYMO’s affiliates, parents, divisions, joint ventures, licensees,
 7 franchisees, assigns, predecessors and successors in interest, and any other legal entities, whether
 8 foreign or domestic, that are owned or controlled by WAYMO, and all predecessors and
 9 successors in interest to such entities, and any entity owned in whole or in part by, affiliated with,
 10 or controlled in whole or in part by WAYMO.

11 2. “GOOGLE” means Google Inc. and its officers, directors, current and former
 12 employees, counsel, agents, consultants, representatives, and any other persons acting on behalf of
 13 any of the foregoing, and GOOGLE’s affiliates, parents, divisions, joint ventures, licensees,
 14 franchisees, assigns, predecessors and successors in interest, and any other legal entities, whether
 15 foreign or domestic, that are owned or controlled by GOOGLE, and all predecessors and
 16 successors in interest to such entities, and any entity owned in whole or in part by, affiliated with,
 17 or controlled in whole or in part by GOOGLE.

18 3. “UBER” means Uber Technologies, Inc. and its officers, directors, current and
 19 former employees, counsel, agents, consultants, representatives, and any other persons acting on
 20 behalf of any of the foregoing, and UBER’s affiliates, parents, divisions, joint ventures, licensees,
 21 franchisees, assigns, predecessors and successors in interest, and any other legal entities, whether
 22 foreign or domestic, that are owned or controlled by UBER, and all predecessors and successors in
 23 interest to such entities, and any entity owned in whole or in part by, affiliated with, or controlled
 24 in whole or in part by UBER.

25 4. “OTTOMOTTO” means Ottomotto LLC and its officers, directors, current and
 26 former employees, counsel, agents, consultants, representatives, and any other persons acting on
 27 behalf of any of the foregoing, and OTTOMOTTO’s affiliates, parents, divisions, joint ventures,

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1 licensees, franchisees, assigns, predecessors and successors in interest, and any other legal entities,
 2 whether foreign or domestic, that are owned or controlled by OTTOMOTTO, and all predecessors
 3 and successors in interest to such entities, and any entity owned in whole or in part by, affiliated
 4 with, or controlled in whole or in part by OTTOMOTTO. For the avoidance of doubt,
 5 OTTOMOTTO includes all former names under which OTTOMOTTO operated, including
 6 without limitation 280 Systems, Inc., 280 Systems, LLC, and Ottomotto, Inc.

7 5. “OTTO TRUCKING” means Otto Trucking LLC and its officers, directors,
 8 current and former employees, counsel, agents, consultants, representatives, and any other persons
 9 acting on behalf of any of the foregoing, and OTTO TRUCKING’s affiliates, parents, divisions,
 10 joint ventures, licensees, franchisees, assigns, predecessors and successors in interest, and any
 11 other legal entities, whether foreign or domestic, that are owned or controlled by OTTO
 12 TRUCKING, and all predecessors and successors in interest to such entities, and any entity owned
 13 in whole or in part by, affiliated with, or controlled in whole or in part by OTTO TRUCKING.

14 6. “DEFENDANTS” means UBER, OTTOMOTTO, and OTTO TRUCKING.

15 7. “LEVANDOWSKI” means Anthony Levandowski.

16 8. “FUJI” means each version or generation of the LIDAR system(s) DEFENDANTS
 17 have identified by the name Fuji, including any “precursor” or related projects such as LIDAR 0
 18 or Mr. Fast Lens.

19 9. “SPIDER” means each version or generation of the LIDAR system(s)
 20 DEFENDANTS have identified by the name Spider.

21 10. “OWL” means each version or generation of the LIDAR system(s) DEFENDANTS
 22 have identified by the name Owl.

23 11. “KSHIRSAVAR” means Sameer Kshirsagar.

24 12. “RADUTA” means Radu Raduta.

25 1. “MISAPPROPRIATED MATERIALS” refers to all GOOGLE and WAYMO
 26 DOCUMENTS and materials, whether digital or physical, and regardless of the manner stored, for
 27 which any current or former employee of DEFENDANTS retained possession, without

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1 authorization of either GOOGLE or WAYMO, after the employee ended his or her employment
2 with GOOGLE/WAYMO. Without limitation, MISAPPROPRIATED MATERIALS includes at
3 least: (i) each of the more than 14,000 digital files downloaded by LEVANDOWSKI on or about
4 December 11, 2015 from the SVN repository; (ii) each file copied by LEVANDOWSKI from his
5 GOOGLE laptop to an RDF5 USB 3.0 card reader on or about December 14, 2015; (iii) each of
6 the five files that were exported by LEVANDOWSKI from Google Drive to a personal device on
7 or about January 4, 2016; (iv) the file exported by LEVANDOWSKI from Google Drive to a
8 personal device on or about January 11, 2016; (v) the file that was exported by LEVANDOWSKI
9 from Google Drive to a personal device on or about November 19, 2016; (vi) the file that was
10 exported by LEVANDOWSKI from Google Drive to a personal device on or about November 4,
11 2016; each of the five files that were exported by KSHIRSAGAR from Google Drive in or around
12 June and July 2016; (vii) each of the three files that were exported by RADUTA from Google
13 Drive on or around July 28, 2016.

14 13. “LiDAR” means Light Detection and Ranging.

15 14. “ASSERTED PATENTS” means U.S. Patent Nos. 8,836,922; 9,368,936;
16 9,285,464; and 9,086,273.

17 15. “PCB” means printed circuit board.

18 16. “DOCUMENTS” shall INCLUDE, without limitation, all written, graphic or
19 otherwise recorded material, INCLUDING without limitation, electronically stored information
20 regardless of the form of storage medium, microfilms or other film records or impressions, tape
21 recordings or computer cards, floppy disks or printouts, any and all papers, photographs, films,
22 recordings, memoranda, books, records, accounts, communications, letters, telegrams,
23 correspondence, notes of meetings, notes of conversations, notes of telephone calls, inter-office
24 memoranda or written communications of any nature, recordings of conversations either in
25 writings or upon any mechanical or electrical recording devices, INCLUDING e-mail, notes,
26 papers, reports, analyses, invoices, canceled checks or check stubs, receipts, minutes of meetings,
27 time sheets, diaries, desk calendars, ledgers, schedules, licenses, financial statements, telephone

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1 bills, logs, and any differing versions of any of the foregoing, whether so denominated, formal,
2 informal or otherwise, as well as copies of the foregoing which differ in any way, INCLUDING
3 by the addition of handwritten notations or other written or printed matter of any nature, from the
4 original. The foregoing specifically INCLUDES information stored in a computer database and
5 capable of being generated in documentary form, such as electronic mail, text messages (i.e., SMS
6 messages), other electronic messages including messages sent or received via Slack, WhatsApp,
7 Google Hangouts, Facebook Messenger, and the like.

8 17. “COMMUNICATIONS” shall mean, without limitation, any transmission,
9 conveyance or exchange of a word, statement, fact, thing, idea, DOCUMENT, instruction,
10 information, demand or question by any medium, whether by written, oral or other means,
11 including but not limited to, electronic communications and electronic mail (“e-mail”).

12 18. “THING” means any tangible object, other than a DOCUMENT.

13 19. “PERSON” means to any individual, corporation, proprietorship, association, joint
14 venture, company, partnership or other business or legal entity, including governmental bodies and
15 agencies. The masculine includes the feminine and vice versa; the singular includes the plural and
16 vice versa.

17 20. “REGARDING” shall mean relating to, referring to, mentioning, reflecting,
18 pertaining to, evidencing, involving, describing, discussing, commenting on, embodying,
19 responding to, supporting, contradicting, or constituting (in whole or in part), as the context makes
20 appropriate.

21 21. “INCLUDE” and “INCLUDING” shall mean including without limitation.

22 22. Use of the singular also INCLUDES the plural and vice-versa.

23 23. The words “or” and “and” shall be read in the conjunctive and in the disjunctive
24 wherever they appear, and neither of these words shall be interpreted to limit the scope of these
25 Requests for Production.

26 24. The use of a verb in any tense shall be construed as the use of the verb in all other
27 tenses.

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1 25. The term “any” shall include “all” and “all” shall include “any.”

INSTRUCTIONS

3 The following instructions shall apply to each of the Requests herein:

4 1. In answering the following Requests, furnish all available information, including
 5 information in the possession, custody or control of any of DEFENDANTS’ attorneys, directors,
 6 officers, agents, employees, representatives, associates, investigators, divisions, affiliates,
 7 partnerships, parents, subsidiaries and PERSONS under DEFENDANTS’ control, who have the
 8 best knowledge, not merely information known to DEFENDANTS based on DEFENDANTS own
 9 personal knowledge. If DEFENDANTS cannot fully respond to the following Requests after
 10 exercising due diligence to secure the information requested thereby, so state, and specify the
 11 portion of each Request that cannot be responded to fully and completely. In the latter event, state
 12 what efforts were made to obtain the requested information and the facts relied upon that support
 13 the contention that the Request cannot be answered fully and completely; and state what
 14 knowledge, information or belief DEFENDANTS have concerning the unanswered portion of any
 15 such Request.

16 2. All documents must be produced in accordance with the requirements of Federal
 17 Rule of Civil Procedure 34(b).

18 3. Electronic records and computerized information shall be produced in an
 19 intelligible format, together with a description of the system from which they were derived
 20 sufficient to permit rendering the records and information intelligible.

21 4. Selection of documents from the files and other sources and the numbering of such
 22 documents shall be performed in such a manner as to ensure that the source of each document can
 23 be determined.

24 5. File folders with tabs or labels or directories of files identifying documents shall be
 25 produced intact with such documents.

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1 6. Documents attached to each other shall not be separated. All documents that
2 respond, in whole or in part, to any portion of any request shall be produced in their entirety,
3 including all addenda, appendices, attachments and enclosures.
4

5 7. If DEFENDANTS’ response to a particular Request is a statement that
6 DEFENDANTS lack the ability to comply with that Request, DEFENDANTS shall specify
7 whether the inability to comply is because the particular item or category of information never
8 existed, has been destroyed, has been lost, misplaced or stolen, or has never been, or is no longer
9 in DEFENDANTS’ possession, custody or control, in which case DEFENDANTS shall identify
10 the name and address of any person or entity known or believed by DEFENDANTS to have
11 possession, custody or control of that information or category of information.
12

13 8. DEFENDANTS’ obligation to respond to these Requests is continuing, and their
14 responses are to be supplemented to include subsequently acquired information in accordance with
15 the requirements of Rule 26(e) of the Federal Rules of Civil Procedure.
16

DOCUMENT REQUESTS

REQUEST FOR PRODUCTION NO. 153:

17 All DOCUMENTS and COMMUNICATIONS REGARDING the Project Chauffeur
18 Bonus Program.
19

REQUEST FOR PRODUCTION NO. 154:

20 All agreements between any DEFENDANT and Nevada ATCF LLC.
21

REQUEST FOR PRODUCTION NO. 155:

22 All DOCUMENTS and COMMUNICATIONS REGARDING any agreements between
23 any DEFENDANT and Nevada ATCF LLC.
24

REQUEST FOR PRODUCTION NO. 156:

25 All COMMUNICATIONS between LEVANDOWSKI and any PERSON (INCLUDING
26 DEFENDANTS) REGARDING Nevada ATCF LLC.
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1 **REQUEST FOR PRODUCTION NO. 157:**

2 DOCUMENTS sufficient to show the reasons behind DEFENDANTS’ and/or OTTO
3 TRUCKING’s decision not to deploy self-driving trucks in Texas.

4 **REQUEST FOR PRODUCTION NO. 158:**

5 DOCUMENTS sufficient to show DEFENDANTS’ past, present, and future plans to test
6 self-driving trucks in any state, INCLUDING (without limitation) Ohio, Nevada, Texas, Colorado,
7 Pennsylvania, Arizona, and California.

8 **REQUEST FOR PRODUCTION NO. 159:**

9 DOCUMENTS sufficient to show the total number of miles DEFENDANTS’ self-driving
10 trucks have traveled each month in each state, broken out by month and by state.

11 **REQUEST FOR PRODUCTION NO. 160:**

12 DOCUMENTS sufficient to show DEFENDANTS’ past, present, and future plans to test
13 self-driving trucks in any state, INCLUDING (without limitation) Ohio, Nevada, Texas, Colorado,
14 Pennsylvania, Arizona, and California.

15 **REQUEST FOR PRODUCTION NO. 161:**

16 All DOCUMENTS and COMMUNICATIONS REGARDING the naming of FUJI.

17 **REQUEST FOR PRODUCTION NO. 162:**

18 All DOCUMENTS and COMMUNICATIONS REGARDING the naming of SPIDER.

19 **REQUEST FOR PRODUCTION NO. 163:**

20 All DOCUMENTS and COMMUNICATIONS REGARDING the naming of OWL.

21 **REQUEST FOR PRODUCTION NO. 164:**

22 All COMMUNICATIONS between Brian McClendon and any PERSON REGARDING
23 LiDAR, OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSKI.

24 **REQUEST FOR PRODUCTION NO. 165:**

25 All COMMUNICATIONS between Travis Kalanick and any PERSON REGARDING
26 LiDAR, OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSKI.

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1 **REQUEST FOR PRODUCTION NO. 166:**

2 All COMMUNICATIONS between John Bares and any PERSON REGARDING
3 OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSKI.

4 **REQUEST FOR PRODUCTION NO. 167:**

5 All COMMUNICATIONS between Cameron Poetscher and any PERSON REGARDING
6 LiDAR, OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSKI.

7 **REQUEST FOR PRODUCTION NO. 168:**

8 All minutes of meetings of any of DEFENDANTS’ Board of Directors, or any committee
9 thereof, during which LiDAR was discussed.

10 **REQUEST FOR PRODUCTION NO. 169:**

11 All minutes of meetings of UBER’s Board of Directors, or any committee thereof, during
12 which OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSKI was discussed.

13 **REQUEST FOR PRODUCTION NO. 170:**

14 All DOCUMENTS REGARDING LiDAR that were prepared for or received by any of
15 DEFENDANTS’ Board of Directors, or any committee thereof.

16 **REQUEST FOR PRODUCTION NO. 171:**

17 All DOCUMENTS REGARDING OTTOMOTTO, OTTO TRUCKING, or
18 LEVANDOWSKI that were prepared for or received by UBER’s Board of Directors, or any
19 committee thereof.

20 **REQUEST FOR PRODUCTION NO. 172:**

21 All roadmaps, timelines, and development schedules REGARDING LiDAR.

22 **REQUEST FOR PRODUCTION NO. 173:**

23 All roadmaps, timelines, and development schedules REGARDING self-driving vehicles.

24 **REQUEST FOR PRODUCTION NO. 174:**

25 All forecasts, market analyses, or market projects REGARDING self-driving vehicles.

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1 **REQUEST FOR PRODUCTION NO. 175:**

2 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
3 DEFENDANTS comprising [REDACTED]

4 **REQUEST FOR PRODUCTION NO. 176:**

5 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
6 DEFENDANTS comprising a [REDACTED]
7 [REDACTED].

8 **REQUEST FOR PRODUCTION NO. 177:**

9 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
10 DEFENDANTS comprising a [REDACTED]

11 [REDACTED]

12 **REQUEST FOR PRODUCTION NO. 178:**

13 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
14 DEFENDANTS comprising a [REDACTED]

15 [REDACTED]

16 **REQUEST FOR PRODUCTION NO. 179:**

17 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
18 DEFENDANTS comprising [REDACTED]

19 [REDACTED]

20 **REQUEST FOR PRODUCTION NO. 180:**

21 DOCUMENTS sufficient to show the distribution of laser diode positions and orientations
22 for transmit blocks in all LiDAR designs considered or implemented by DEFENDANTS.

23 **REQUEST FOR PRODUCTION NO. 181:**

24 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
25 DEFENDANTS comprising a LiDAR transmit block with [REDACTED]
26 [REDACTED] B.

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1 **REQUEST FOR PRODUCTION NO. 182:**

2 All DOCUMENTS and COMMUNICATIONS REGARDING the design history of FUJI’s
3 use of a LiDAR transmit block with [REDACTED]

4 **REQUEST FOR PRODUCTION NO. 183:**

5 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
6 DEFENDANTS comprising a LiDAR transmit block, with [REDACTED]
7 [REDACTED].

8 **REQUEST FOR PRODUCTION NO. 184:**

9 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
10 DEFENDANTS comprising a LiDAR transmit block with [REDACTED]
11 [REDACTED]
12 [REDACTED]s.

13 **REQUEST FOR PRODUCTION NO. 185:**

14 DOCUMENTS sufficient to show any manufacturing process for a large fast-axis
15 collimating lens assembly considered or implemented by DEFENDANTS.

16 **REQUEST FOR PRODUCTION NO. 186:**

17 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
18 DEFENDANTS comprising [REDACTED]
19 [REDACTED]

20 **REQUEST FOR PRODUCTION NO. 187:**

21 DOCUMENTS sufficient to show the azimuth angles for a multi-PCB transmit block in
22 any LiDAR system considered or implemented by DEFENDANTS.

23 **REQUEST FOR PRODUCTION NO. 188:**

24 DOCUMENTS sufficient to show any techniques for [REDACTED]
25 [REDACTED]
26 [REDACTED] considered or implemented by DEFENDANTS.

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1 **REQUEST FOR PRODUCTION NO. 189:**

2 DOCUMENTS sufficient to show any techniques for [REDACTED]

3 [REDACTED]
4 [REDACTED] considered or implemented by DEFENDANTS.

5 **REQUEST FOR PRODUCTION NO. 190:**

6 DOCUMENTS sufficient to show any techniques for [REDACTED]

7 [REDACTED] in all LiDAR designs considered or implemented by
8 DEFENDANTS.

9 **REQUEST FOR PRODUCTION NO. 191:**

10 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by

11 DEFENDANTS comprising the use of [REDACTED]

12 [REDACTED].

13 **REQUEST FOR PRODUCTION NO. 192:**

14 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by

15 DEFENDANTS comprising [REDACTED]

16 [REDACTED]

17 **REQUEST FOR PRODUCTION NO. 193:**

18 DOCUMENTS sufficient to show any techniques [REDACTED]

19 [REDACTED] considered or implemented by DEFENDANTS.

20 **REQUEST FOR PRODUCTION NO. 194:**

21 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by

22 DEFENDANTS comprising the use of [REDACTED]

23 [REDACTED].

24 **REQUEST FOR PRODUCTION NO. 195:**

25 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by

26 DEFENDANTS comprising the use of [REDACTED]

27 [REDACTED].

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1 **REQUEST FOR PRODUCTION NO. 196:**

2 DOCUMENTS sufficient to show the [REDACTED]
[REDACTED].

4 **REQUEST FOR PRODUCTION NO. 197:**

5 DOCUMENTS sufficient to show the [REDACTED]
[REDACTED]
[REDACTED]

8 **REQUEST FOR PRODUCTION NO. 198:**

9 DOCUMENTS sufficient to show the [REDACTED]
[REDACTED]
[REDACTED]

12 **REQUEST FOR PRODUCTION NO. 199:**

13 DOCUMENTS sufficient to show the [REDACTED]
[REDACTED].

15 **REQUEST FOR PRODUCTION NO. 200:**

16 DOCUMENTS sufficient to show all self-driving car test scenarios that informed, drove,
17 or influenced any LiDAR design considered or implemented by DEFENDANTS.

18 **REQUEST FOR PRODUCTION NO. 201:**

19 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
20 DEFENDANTS configured [REDACTED]

21 **REQUEST FOR PRODUCTION NO. 202:**

22 DOCUMENTS sufficient to show DEFENDANTS’ use of the idea of designing a LiDAR
23 system [REDACTED].

24 **REQUEST FOR PRODUCTION NO. 203:**

25 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
26 DEFENDANTS configured to [REDACTED]
[REDACTED]

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1 **REQUEST FOR PRODUCTION NO. 204:**

2 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
3 DEFENDANTS configured [REDACTED]
4 [REDACTED]

5 **REQUEST FOR PRODUCTION NO. 205:**

6 DOCUMENTS sufficient to show the vertical resolution profile of any LiDAR design
7 considered or implemented by DEFENDANTS.

8 **REQUEST FOR PRODUCTION NO. 206:**

9 DOCUMENTS sufficient to show the horizontal resolution specifications of any LiDAR
10 design considered or implemented by DEFENDANTS.

11 **REQUEST FOR PRODUCTION NO. 207:**

12 DOCUMENTS sufficient to show the peak vertical resolution specifications of any LiDAR
13 design considered or implemented by DEFENDANTS.

14 **REQUEST FOR PRODUCTION NO. 208:**

15 DOCUMENTS sufficient to show the range specifications for [REDACTED]
16 [REDACTED] of any LiDAR design considered or implemented by DEFENDANTS.

17 **REQUEST FOR PRODUCTION NO. 209:**

18 DOCUMENTS sufficient to show the range specifications for [REDACTED]
19 [REDACTED] of any LiDAR design considered or implemented by DEFENDANTS.

20 **REQUEST FOR PRODUCTION NO. 210:**

21 DOCUMENTS sufficient to show the vertical field of view specifications for all 64-beam
22 LiDAR designs considered or implemented by DEFENDANTS.

23 **REQUEST FOR PRODUCTION NO. 211:**

24 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
25 DEFENDANTS comprising a [REDACTED]
26 [REDACTED]
27 [REDACTED].

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1 **REQUEST FOR PRODUCTION NO. 212:**

2 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
3 DEFENDANTS comprising a [REDACTED]
4 [REDACTED]

5 **REQUEST FOR PRODUCTION NO. 213:**

6 DOCUMENTS sufficient to show any techniques for [REDACTED]
7 [REDACTED] considered or implemented by DEFENDANTS.

8 **REQUEST FOR PRODUCTION NO. 214:**

9 DOCUMENTS sufficient to show any techniques for [REDACTED]
10 [REDACTED] considered or implemented by DEFENDANTS in a LiDAR design.

11 **REQUEST FOR PRODUCTION NO. 215:**

12 DOCUMENTS sufficient to show any techniques for [REDACTED]
13 [REDACTED] considered or implemented by DEFENDANTS in a LiDAR design.

14 **REQUEST FOR PRODUCTION NO. 216:**

15 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
16 DEFENDANTS comprising [REDACTED].

17 **REQUEST FOR PRODUCTION NO. 217:**

18 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
19 DEFENDANTS comprising [REDACTED].

20 **REQUEST FOR PRODUCTION NO. 218:**

21 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
22 DEFENDANTS comprising [REDACTED].

23 **REQUEST FOR PRODUCTION NO. 219:**

24 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
25 DEFENDANTS comprising [REDACTED]
26 [REDACTED]

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1 **REQUEST FOR PRODUCTION NO. 220:**

2 DOCUMENTS sufficient to show any technique for [REDACTED]
3 [REDACTED] considered or implemented by DEFENDANTS in a
4 LiDAR design.

5 **REQUEST FOR PRODUCTION NO. 221:**

6 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
7 DEFENDANTS comprising [REDACTED].

8 **REQUEST FOR PRODUCTION NO. 222:**

9 DOCUMENTS sufficient to show all software for [REDACTED]
10 [REDACTED] considered or implemented by DEFENDANTS in any LiDAR design.

11 **REQUEST FOR PRODUCTION NO. 223:**

12 DOCUMENTS sufficient to show the [REDACTED]
13 considered or implemented by DEFENDANTS in any LiDAR design to [REDACTED]
14 [REDACTED].

15 **REQUEST FOR PRODUCTION NO. 224:**

16 DOCUMENTS sufficient to show the [REDACTED]
17 considered or implemented by DEFENDANTS in any LiDAR design to [REDACTED]
18 [REDACTED]

19 **REQUEST FOR PRODUCTION NO. 225:**

20 DOCUMENTS sufficient to show the [REDACTED]
21 considered or implemented by DEFENDANTS in any LiDAR design to [REDACTED]
22 [REDACTED] es.

23 **REQUEST FOR PRODUCTION NO. 226:**

24 DOCUMENTS sufficient to show the vertical resolution specifications of any LiDAR
25 design considered or implemented by DEFENDANTS.
26
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1 **REQUEST FOR PRODUCTION NO. 227:**

2 DOCUMENTS sufficient to show the horizontal field of view specifications of any LiDAR
3 design considered or implemented by DEFENDANTS.

4 **REQUEST FOR PRODUCTION NO. 228:**

5 DOCUMENTS sufficient to show the update-rate specifications of any LiDAR design
6 considered or implemented by DEFENDANTS.

7 **REQUEST FOR PRODUCTION NO. 229:**

8 DOCUMENTS sufficient to show the beam divergence specifications of any LiDAR
9 design considered or implemented by DEFENDANTS.

10 **REQUEST FOR PRODUCTION NO. 230:**

11 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
12 DEFENDANTS comprising [REDACTED]
13 [REDACTED].

14 **REQUEST FOR PRODUCTION NO. 231:**

15 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
16 DEFENDANTS comprising [REDACTED]
17 [REDACTED]

18 **REQUEST FOR PRODUCTION NO. 232:**

19 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
20 DEFENDANTS comprising [REDACTED].

21 **REQUEST FOR PRODUCTION NO. 233:**

22 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
23 DEFENDANTS comprising [REDACTED]
24 [REDACTED]

25 **REQUEST FOR PRODUCTION NO. 234:**

26 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
27 DEFENDANTS comprising [REDACTED]

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1 [REDACTED]
2 [REDACTED].
3

REQUEST FOR PRODUCTION NO. 235:

4 DOCUMENTS sufficient to show all LiDAR designs considered or implemented by
5 DEFENDANTS comprising [REDACTED]
6 [REDACTED]
7 [REDACTED].
8

REQUEST FOR PRODUCTION NO. 236:

9 DOCUMENTS sufficient to show [REDACTED]
10 [REDACTED]
11 [REDACTED].
12

REQUEST FOR PRODUCTION NO. 237:

13 DOCUMENTS sufficient to show any sequence of steps for assembling LiDAR units
14 considered or implemented by DEFENDANTS.

REQUEST FOR PRODUCTION NO. 238:

16 DOCUMENTS sufficient to show any sequence of steps for assembling LiDAR motor
17 components considered or implemented by DEFENDANTS.

REQUEST FOR PRODUCTION NO. 239:

19 DOCUMENTS sufficient to show any sequence of steps for assembling LiDAR transmit
20 components considered or implemented by DEFENDANTS.

REQUEST FOR PRODUCTION NO. 240:

22 DOCUMENTS sufficient to show any sequence of steps for assembling LiDAR receive
23 components considered or implemented by DEFENDANTS.

REQUEST FOR PRODUCTION NO. 241:

25 DOCUMENTS sufficient to show any sequence of steps for assembly of LiDAR optical
26 cavity components considered or implemented by DEFENDANTS.
27
28

01980-00104/9336283.1

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1 **REQUEST FOR PRODUCTION NO. 242:**

2 DOCUMENTS sufficient to show any sequence of steps for LiDAR calibration considered
3 or implemented by DEFENDANTS.

4 **REQUEST FOR PRODUCTION NO. 243:**

5 DOCUMENTS sufficient to show any techniques for thermal calibration for a LiDAR
6 system’s photodetectors considered or implemented by DEFENDANTS.

7 **REQUEST FOR PRODUCTION NO. 244:**

8 DOCUMENTS sufficient to show any techniques for mirror angle calibration for a LiDAR
9 system considered or implemented by DEFENDANTS.

10 **REQUEST FOR PRODUCTION NO. 245:**

11 DOCUMENTS sufficient to show any techniques for walk calibration for a LiDAR system
12 considered or implemented by DEFENDANTS.

13 **REQUEST FOR PRODUCTION NO. 246:**

14 DOCUMENTS sufficient to show any instructions for transmit and receive alignment and
15 tuning of a LiDAR system considered or implemented by DEFENDANTS.

16 **REQUEST FOR PRODUCTION NO. 247:**

17 DOCUMENTS sufficient to show any instructions for calibrating the intensity of a LiDAR
18 system considered or implemented by DEFENDANTS.

19 **REQUEST FOR PRODUCTION NO. 248:**

20 DOCUMENTS sufficient to show any instructions for running extrinsic calibration of a
21 LiDAR system considered or implemented by DEFENDANTS.

22 **REQUEST FOR PRODUCTION NO. 249:**

23 DOCUMENTS sufficient to show any techniques for thermal rotary coupling in a LiDAR
24 system considered or implemented by DEFENDANTS.

25 **REQUEST FOR PRODUCTION NO. 250:**

26 DOCUMENTS sufficient to show any techniques for amplifying a fiber laser in a LiDAR
27 system considered or implemented by DEFENDANTS.

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

1 **REQUEST FOR PRODUCTION NO. 251:**

2 DOCUMENTS sufficient to show all materials used for amplifying a fiber laser in a
3 LiDAR system considered or implemented by DEFENDANTS.

4 **REQUEST FOR PRODUCTION NO. 252:**

5 DOCUMENTS sufficient to show all PCB design schematics for LiDAR transmit boards
6 considered or implemented by DEFENDANTS.

7 **REQUEST FOR PRODUCTION NO. 253:**

8 DOCUMENTS sufficient to show all PCB design schematics for LiDAR receive boards
9 considered or implemented by DEFENDANTS.

10 **REQUEST FOR PRODUCTION NO. 254:**

11 DOCUMENTS sufficient to show all design schematics for LiDAR rotary coupling boards
12 considered or implemented by DEFENDANTS.

13 **REQUEST FOR PRODUCTION NO. 255:**

14 DOCUMENTS sufficient to show all PCB design schematics for LiDAR motor boards
15 considered or implemented by DEFENDANTS.

16 **REQUEST FOR PRODUCTION NO. 256:**

17 DOCUMENTS sufficient to show all PCB design schematics for radar sensors considered
18 or implemented by DEFENDANTS.

19 **REQUEST FOR PRODUCTION NO. 257:**

20 DOCUMENTS sufficient to show DEFENDANTS’ consideration or implementation of a
21 128 channel LiDAR system.

22 **REQUEST FOR PRODUCTION NO. 258:**

23 DOCUMENTS sufficient to show DEFENDANTS’ consideration or implementation of a
24 [REDACTED] LiDAR system.

25 **REQUEST FOR PRODUCTION NO. 259:**

26 DOCUMENTS sufficient to show DEFENDANTS’ consideration or implementation of a
27 [REDACTED]

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1 **REQUEST FOR PRODUCTION NO. 260:**

2 DOCUMENTS sufficient to show DEFENDANTS’ consideration or implementation of a
3 [REDACTED] LiDAR system.

4 **REQUEST FOR PRODUCTION NO. 261:**

5 DOCUMENTS sufficient to show DEFENDANTS’ consideration or implementation of
6 using [REDACTED] in a LiDAR system.

7 **REQUEST FOR PRODUCTION NO. 262:**

8 DOCUMENTS sufficient to show DEFENDANTS’ consideration or implementation of a
9 LiDAR design using [REDACTED]

10 **REQUEST FOR PRODUCTION NO. 263:**

11 DOCUMENTS sufficient to show DEFENDANTS’ consideration or implementation of a
12 LiDAR design using [REDACTED].

13 **REQUEST FOR PRODUCTION NO. 264:**

14 DOCUMENTS sufficient to show DEFENDANTS’ consideration or implementation of a
15 LiDAR design having [REDACTED]

16 **REQUEST FOR PRODUCTION NO. 265:**

17 DOCUMENTS sufficient to show DEFENDANTS’ consideration or implementation of
18 LiDAR designs with [REDACTED].

19
20
21 DATED: May 31, 2017

QUINN EMANUEL URQUHART &
22 SULLIVAN, LLP

23
24 By: /s/ Charles K. Verhoeven
25 Charles K. Verhoeven
26 Attorneys for Plaintiff WAYMO LLC.
27
28

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HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**PROOF OF SERVICE**

I, James D. Judah, am employed in the County of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 50 California Street, 22nd Floor, San Francisco, California 94111-4788.

On May 31, 2017, I served true copies of the following document(s) described as “Plaintiff’s Third Set of Requests for Production to Defendants Uber Technologies, Inc.; Ottomotto, LLC; and Otto Trucking LLC” on the interested parties in this action as follows:

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18 **BY ELECTRONIC MAIL TRANSMISSION:** by electronic mail transmission from
19 jamesjudah@quinnemanuel.com on May 31, 2017, by transmitting a PDF format copy of such
20 document(s) to each such person at the e mail address listed above. The document(s) was/were
21 transmitted by electronic transmission and such transmission was reported as complete and
22 without error.

23 Executed on May 31, 2017, at San Francisco, California.

25 _____ /s/ James D. Judah
26 James D. Judah